

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

AGERE SYSTEMS, INC., et al.	:	
	:	
Plaintiffs	:	Civil Action No. 02-CV-3830
	:	
v.	:	(Hon. Legrome D. Davis)
	:	
ADVANCED ENVIRONMENTAL	:	
TECHNOLOGY CORPORATION, et al.,	:	
	:	
Defendants.	:	

**DEFENDANT ASHLAND INC.'S LIST OF EXHIBITS**

**I. Background of Site Exhibits**

1. John Barsum Depositions: June 4, 1997 by EPA; June 5, 1997 by EPA
2. Redacted notes of EPA interview of DeRewal driver on June 18, 1987. (Techlaw, Inc. letter of August 27, 1987 to EPA indicates that the driver was John Barsum.) (no Bates number)
3. Bruce DeRewal Deposition: March 13, 1997 by EPA
4. Manfred F. DeRewal, Jr., Deposition: February 26, 1997, by EPA
5. Manfred DeRewal, Sr., Depositions:  
March 15 and 17, 1989 by EPA;  
December 10-11, 1996 by EPA
6. Marvin Jonas Depositions:  
April 14, 1986 by EPA;  
April 15, 1986 by NJDEP; April 17, 1986 (Lipari Landfill);  
June 20, 1995 (Incollingo case);  
July 18, 1995 (Incollingo case)
7. Jeffrey Shaak Deposition: June 25, 1997 by EPA; 6/04/03.
8. CH2MHill, 1997. Final Remedial Investigation Report prepared for USEPA under Contract No, 68-W-0090. January 31, 1997.
9. NTJS Corporation, 1986. Site Inspection of Boarhead Farms Prepared Under TDD No. F3-8403-25, EPA No. PA-257, Contract No. 68-01-6699 for the Hazardous Site Control Division, U.S. Environmental Protection Agency, January 20, 1986. AR100173-256.
10. USEPA, 1987. NPL Site Narrative for Revere Chemical Co.

11. U.S. Environmental Protection Agency (USEPA), 1989. Record of Decision: DeRewal Chemical Co. EPA ID: NJD980761373, OU1, Kingwood Township, NJ. September 29, 1989. EPA/ROD/R02-89-087 1989.
12. USEPA, 1998a. Proposed Plan: Boarhead Farms Site, Bridgeton Township Bucks County, PA. January 1998,
13. USEPA, 1998b. Record of Decision: Boarhead Farms EPA ID: PAD047726161, OUI, Bridgeton Township, PA. November 18, 1998.
14. USEPA, 1996. Record of Decision: Revere Chemical Co., EPA ID: PADO51395499,
15. USEPA, 2001. Five-Year Review Report, Revere Chemical Co. Superfund Site.
16. Armstrong, D.A. 2001. Letter to J.P. Harper re: Boarhead Farms NPL Site OU-1, with attachment. June 21.
17. Brown and Caldwell. 2004a. Remedial Construction Report, Operable Unit No. 2, Boarhead Farms Superfund Site. May.
18. BCDH. 1978. Correspondence regarding proposed Pollution Incident Prevention ("PIP") plan dated July 25, 1978, with attached PIP dated June 22, 1978.
19. CH2M HILL. RI/FS Work Plan August 1991 (AR 300083- 300305)
20. CH2M HILL. 1992. June 25, 1992 CH2M Hill Summary of Tank and Drum Inventory and Sampling.
21. CH2M HILL. 1997a. Boarhead Farms Remedial Investigation Report. January.
22. CH2M HILL. 1997b. Boarhead Farms Feasibility Study Report. July.
23. Chocallo, C.P. 1972. General Investigation Report. 26 April.
24. EPA. 1988. Residential Sampling and Analysis Plan for Boarhead Farms, PA-257. November 17.
25. EPA. 1993. Federal On-Scene Coordinator's Report for Boarhead Farms NPL Site. June 18, 1992 to September 17, 1993.
26. EPA. 1994. Natural Attenuation of Hexavalent Chromium in Groundwater and Soils. (authors C.D. Palmer and R.W. Puls). EPA Report No. EPA/540/5-94/505. October.
27. EPA. 1995a. Boarhead Farms Superfund Site Engineering Evaluation/Cost Analysis. June.
28. EPA. 1995b. EPA Office of Compliance Sector Notebook Project, Profile of Fabricated Metal Products Industry. EPA Office of Enforcement and Compliance Assurance. EPA Report No. EPA/310-R-95-007. September.

29. EPA. 1996. International Waste Minimization Approaches and Policies to Metal Plating. EPA Office of Solid Waste. EPA Publication No. 530-R-96-008.
30. EPA. 1998a. Superfund Program Proposed Plan, Boarhead Farms site. January.
31. EPA. 2004a. Remedial Construction Report, Operable Unit No, 2, Boarhead Farms Superfund Site. May.
32. EPA. 2004b. Boarhead Farms. Current Site Information. January.
33. EPA. 2004c. Understanding Variation in Partition Coefficient,  $K_d$ , Values, Volume 111. EPA 402-R-04-002C. July.
34. EPA. 2006a. Contaminant Focus, Arsenic. EPA Clu-In Website.
35. EPA. 2006b. Contaminant Focus, Chromium VI. EPA Clu-In Website.
36. 1998. Letter to A. Ferdas, re: Boarhead Farms NPL site, Groundwater Treatment System Discharge. November 4.
37. Harbold, H. 1994. Letter to S. O'Neil, re: Boarhead Farms Superfund Site, Temporary Discharge Approval, with attachments. March 28.
38. Krupka, K.M. and R.J. Serne. 2002. Geochemical Factors Affecting the Behavior of Antimony, Cobalt, Europium, Technetium, and Uranium in Vadose Sediments. PNNL-14126. December.
39. Lynn, W.L., D. Lindorff, and J.F. Dwalinski. 1973. Memo re: Inspection of Revere Chemical Corp. facility in Bridgetown Township. March 12.
40. Boarhead Farm Superfund Site Operable Unit No. 1 Groundwater Model Report, 10/2004 (PHKS061239-061300)
41. PADEP revised permit equivalent for the Boarhead Farm Site Groundwater Treatment Plant Discharge, dated 6/21/01 (BSAI 025758-25785)
42. EPA March 28, 1994 letter from Harry Harbold to Steve O'Neill, PADER with attachments (AR3050520-6063)
43. EPA memorandum dated 11/3/95 from Robert S. Davis to Harry S. Harbold (AR308501-504)
44. Noll, P. and B. Passmore. 1973. Inspection of Boarhead Corp. on 2-14-73.
45. NUS Corporation. 1985: Preliminary Assessment of Boarhead Farms. August.
46. NUS Corporation. 1986. Site Inspection of Boar head Farms. January.
47. NUS Corporation. 1987. A Hazard Ranking System for Boarhead Farms. September 4.
48. October 26, 1976 list of chemicals transported by DeRewal Chemical Company.

49. PADER. 1970. Results of Field Inspection, Boarhead Corporation, A.W. Wills. May 11.
50. PADER. 1973a. Waste Discharge Inspection Report, A.W. Wills, 11/11/03.
51. PADER. 1973b. Industrial Wastes, Boarhead Corporation, A.W. Wills. March 7.
52. PADER. 1973c. Industrial Waste Violation, Boarhead Corporation, A.W. Wills. November 1.
53. Roy F. Weston. 1989. Water Sampling Results.
54. Tetra Tech/Black & Veatch. 2004. Remedial Action Oversight Report. Boarhead Farms Superfund Site, Operable Unit #2. June 25, 2004.
55. US Army Corps of Engineers. 1996. Boarhead Farms Superfund Site Groundwater Treatment Plant, Rapid Response Design Package. June. (AR309165-309307)
56. US Army Corps of Engineers. Draft scope of Work Modification #1 (AR309563-309854)
57. EPA Approval of Removal Action for the Boarhead Farms NPL Site March 18, 1996 (AR400240-400254)
58. Memorandum from Gerald Heston (Western) to Robert McClade Nov. 18. 1994 regarding Boarhead Farms NPL Site Report (AR305337-305377)
59. Work Plan Addendum (IT Corporation) Nov. 1996 (AR309857-AR309901)
60. Weston SPER. 1984. Memo from C. Hylemon to B. Caron, re: Boarhead Farms Superfund Site Assessment, with attachments. April 27.
61. Injunctive order issued by BCCP (No. 76-9647), 10/15/76
62. Letter from City of Philadelphia to DCC regarding unpaid sewer charges for illegal dumping from the Wissinoming Facility, 7/5/78
63. Photographs taken by Peter G. Noll of the Bucks County DOH (5/29/75, 2/26/75, 4/2/76 and 9/23/76)
64. Memorandum dated 5/11/70 from Albert W. Willis, P.E., chief sanitary engineer to Charles M. Meredith, III, Bucks County Commissioner
65. 5/11/70 memorandum from Robert A. Delpino to Charles M. Meredith, III, County Commissioner
66. Waste Discharge Inspection Report dated 2/14/73 and notes of Peter Noll and B. Passmore
67. Complaint for search warrant 3/5/73
68. Waste Discharge Inspection Report; Water or Waste Quality Reports; Memorandum

from A. Wills to C.T. Beechwood dated 3/7/73

69. PADER memo dated 3/12/73; handwritten note dated 3/12/73; photographs
70. 3/20/73 - Photographs taken at Boarhead site.
71. 3/24/73 - Photographs taken at Boarhead site.
72. 10/31/73 - Waste Discharge Inspection Report, Memorandum from A. Wills to J. Daley (PADER), dated 11/1/73, handwritten file memo by P. Noll).
73. 11/1/73 -Waste Discharge Inspection Report).
74. 11/9/73 -Waste Discharge Inspection Report).
75. 1/23/74 - Waste Discharge Inspection Report. Photographs taken at site.
76. 4/17/74 - Field Action Report
77. 4/25/74 - Waste Discharge Inspection Report; P.G. Noll sampling. Photographs taken at site.
78. Betz Environmental Engineers letters dated 7/29/74, 8/12/74, 8/14/74, 8/20/74, 8/28/74, 9/3/74, 9/20/74, 10/9/74 and 10/22/74.
79. 2/26/75 - Waste Discharge Inspection Report; handwritten file memorandum. Photographs taken at site.
80. 5/29/75 -Waste Discharge Inspection Report. Photographs taken at site.
81. 7/1/75 - Manfred DeRewal letter to Dept. of Health dated 7/1/75
82. 7/15/75 - Waste Discharge Inspection Report; handwritten notes. Photographs taken at site.
83. 7/16/75 -Waste Discharge Inspection Report; BCDH Field Action Report).
84. 4/1/76 - Waste Discharge Inspection Report
85. 4/2/76 - Waste Discharge Inspection Report). Photographs taken at site.
86. 5/4/76 - Photographs taken at Boarhead site
87. 6/2/76 - Waste Discharge Inspection Report
88. 7/22/76 - Bridgeton Township Police Report with American Cyanamid Bill of Lading attached
89. 7/25/76 - Bridgeton Township Police Complaint/Information
90. 7/27/76 - Bridgeton Township Complaint/Information Report; PADER Field Action Report

91. 9/8/76 - Waste Discharge Inspection Report;
92. 9/8/76 - Bridgeton Township Police Complaint/Inspection Report; photographs identified as B 76-871;
93. E. Hogg memorandum to file dated 9/10/76
94. Bucks Co. Fire Marshal's Initial Report of 9/9/76;
95. newspaper article showing tanker; Water or Waste Quality Report).
96. 9/9/76 - E. Hogg memorandum to file dated 9/10/76
97. Handwritten notes of P. Noll, dated 9/9/76).
98. 9/23/76 - Waste Discharge Inspection Report, P. Noll memorandum and letter on sampling dated 11/1/76. Photographs taken at site.
99. 10/1/76 - PADER P. Yangla memorandum to S. Currant.
100. 10/15/76 – Agreed Injunction Order
101. 10/19/76 -Waste Discharge Inspection Report; P.G. Noll Handwritten notes).
102. 10/26/76 - List of chemicals transported by DeRewal Chemical Co. prepared, apparently by PennDot. (Typewritten and handwritten list received by BCDH on 10/26/76).
103. 11/4/76 - Waste Discharge Inspection Report
104. 4/12/77 – Waste Discharge Inspection Report
105. 1/17/80 - BCDH File Report
106. 12/22/80 - BCDH Field Report dated 1/17/80
107. 7/22/81 - BCDH File Report
108. 5/25/83 - Waste Discharge Inspection Report
109. 12/1/83 - Waste Discharge Inspection Report
110. 4/18/84 - BCDH File Report
111. 3/14/85 - Waste Discharge Inspection Report
112. Intelligencer newspaper photo, September 1976
113. Boarhead Corporation Certificate of Incorporation dated September 2, 1969 [P-5]
114. Deed Between Robert and Ruth Buckman and Boarhead Corporation dated October 16, 1969 [P-6]

- 115. DeRewal Chemical Company, Inc. Certificate of Incorporation dated December 29, 1969 [P-7]
- 116. Bench opinion filed May 16, 1978 in United States v. Manfred DeRewal, et al. in the United States District Court for the Eastern District of Pennsylvania at Docket No. 77-287
- 117. Environmental Chemical Control, Inc. Certificate of Incorporation dated October 18, 1976 [P-27]

## **II. Exhibits re: Plaintiffs**

### **A. Cytec (American Cyanamid)**

- 118. Cytec August 15, 1994 Response to EPA (CYTC000777-783)
- 119. Cytec, 1994. Response to USEPA March 11, 1994 correspondence. April 28, 1994.
- 120. American Cyanamid Company, 1988. Response to USEPA June 10, 1988 correspondence. July 13, 1988.
- 121. American Cyanamid, 1976. Series of shipping documents from the Bound Brook NJ facility (BQ 0104-150)
- 122. American Cyanamid Company, 1993. Response to USEPA May 26, 1993 correspondence. Includes attachments. July 2, 1993.
- 123. Bailey, Robert E., 1990. Oral Deposition in the matter of United States of America v. Helen Kramer, et. al., Civil Action No. 89-4380. August 14, 1990. Includes Exhibit Bailey-3.
- 124. Frankel, Sydney A., 1991. Oral Deposition in the matter of United States of America v. Helen Kramer et, al., Civil Action Nos. 89-4340, 89-4380. February 27, 1991.
- 125. Frankel, Sydney A. 1994. Statement and transcript of September 28, 1993 Interview with Sidney A. Frankel. January 3, 1994.
- 126. Frankel, Sydney A., 2005. Oral Deposition in the matter of Boarhead Farms Agreement Group v. AETC et. al., Civil Action No. 02-3830. January 24, 2005.
- 127. Jerome, Joel, 2005. Oral Deposition in the matter of Boarhead Farms Agreement Group v AETC et. al., Civil Action No. 02-CV-3830. January 6, 2005.
- 128. Jonas handwritten ledger of waste disposal for 1974 (marked as Exhibit 2/18/75 in Kramer Federal litigation and as Jonas 14 in 6/21/95 deposition in Lipari litigation)
- 129. Jonas February 18, 1975 Landfill Sites - Coding (marked as Exhibit Jonas -14, 6/21/95)

130. Jonas handwritten ledger of waste disposal for 1974 (marked as Exhibit 2/18/75 in Kramer Federal litigation)
131. Jonas February 18, 1975 Landfill Sites - Coding (marked as Exhibit Jonas -14, 6/21/95)
132. Jonas, 1972. Application for Certification to Collect or Haul Solid Waste (Exhibit Jonas 20, 6-22-95).
133. Jonas tariff for solid waste collection 4/19/72 (marked as Exhibit Jonas-9, 6/20/95).
134. Jonas June 6, 1972 Application for Certification to collect or haul solid waste (marked as Exhibit Jonas 20).
135. Jonas 1974 N.J. Department Registration Statement for a solid/liquid waste collection or hauler (marked as Exhibit Jonas -15, 6/21/95; different version marked as Exhibit Jonas -16, 6/21/95)
136. Jonas, Inc. 1975. Correspondence to NJDEP re coding of materials, landfills and recycling plants. February 18, 1975 (labeled as Exhibit Jonas 14, 6/21/1995).
137. Jonas 1975 Registration statement for solid/liquid waste collect or haul (marked as Exhibit Jonas -12 (6/21/95); another version marked as Jonas -13 (6/21/95))
138. Jonas 3-ring binder ledger pages, 1976-1979, Bates #00000020-00000050.
139. Exhibit A - handwritten "Summary of Waste Shipments" made by Bound Brook Plant via Jonas 1976-78 - (summary marked Frankel Exhibit 1 contains information for 1977 only, complete version marked as Exhibit Bailey 3).
140. American Cyanamid "Blanket MSO" issued to Jonas, Inc. for 1976 "to cover the shipment of aqueous base chemical waste - 4160 from our 4-NOX Process" (BQ 0103) (marked as Exhibit Jerome-7)
141. American Cyanamid's internal memorandum of April 9, 1976, Pharmacy Process, stating that Jonas accepted PCIC waste liquors (potassium Cyanodithioimino carbate) for incineration.
142. Jonas proposal of May 27, 1976 to American Cyanamid to haul waste drums. Jonas letter to American Cyanamid of December 9, 1976 that it needs to raise rates on waste tar and waste solvents but not on ammonia and "4160" waste.
143. American Cyanamid "Blanket order to pick up and remove as required \_\_\_\_\_? mixed waste" in 1977 issued to Jonas, Inc. (BQ 0085-86) (marked as Exhibit Bailey 5 and Frankel 3).
144. Handwritten chart indicates Jonas pick up on October 7, 1977 of various wastes, indicating sources of manufacturing process.



145. December 15, 1977 letter from Sidney Frankel to Jonas with list of wastes (marked as Exhibit Bailey 4 and Frankel 5 and Frankel 4 (2005 dep.)).
146. "Blanket MSO" to "pick-up and remove drummed mixed waste" in 1978 issued to Jonas Inc. (marked as Exhibit Bailey 6 and Frankel 7 (1991 dep.) and Frankel 5 (2005 dep.)
147. American Cyanamid June 9, 1978 Certification to N.J. Division of Motor Vehicles that Jonas providing chemical waste removal since 1972. (marked as Exhibit Frankel 9 at 1991 dep. and Frankel 6 at 2005 dep.)
148. Documents marked as Jonas 3-Ring Binder Pages used by EPA with notation "American Cyanamid"
149. USEPA, 2006. American Cyanamid, New Jersey, EPA ID#: NJD002173276, Site Details. March 21, 2006.
150. "Chart Disposal of Wastes - Bound Brook" attached to S.A. Frankel December 15, 1977 Memorandum (marked as Exhibit Jerome - 3).
151. Handwritten ledger titled "American Cyanamid, Bound Brook, NJ - showing disposal of material starting 6/21
152. Handwritten list American Cyanamid material and disposal site 1976
153. Handwritten list of ammonia shipment and destinations in 1976
154. Handwritten list of waste acid shipments and destination in 197
155. Handwritten list of waste caustic shipments destination in 1976
156. Handwritten list of 1977 American Cyanamid Bound Brook, NJ material and disposal sites.
157. Jonas 1978 NJDEP Registration Statement (marked as Exhibit Jonas -11, 6/21/95)
158. Handwritten list of 1979 American Cyanamid, Bound Brook, NJ material and disposal site.
159. Jonas Waste Removal Bills of Lading
  - 9 for waste solvents signed by various Jonas agents (BQ 0114, 0017-0119, 0123-0124, 0136, 0147-0148) (collectively marked as Exhibit Jerome 5 and two additional not marked (BQ 0144 and 0149);
  - 3 for waste still bottoms signed by \_\_\_\_?\_\_\_\_ (BQ 0139, 0141-0142) (collectively marked as Exhibit Jerome 6);

- 26 documents for waste ammonia water signed John Barsum, Ed Long, Bruce DeRewal (known DeRewal drivers) and others (BO, 105-0111, 0114, 0115-0116, 0121-0122, 0125-0128, 0130, 0132-0135, 0138, 0143, 0145-0146) (collectively marked as Exhibit Jerome 4);
  - 1 for "Isopropanol (alcohol waste) (BQ 0137) (marked as Exhibit Jerome 8);
  - 6 for waste tar (BQ 0112, 00120, 0129, 0131, 0140, 0150) (collectively marked as Exhibit Jerome 9);
  - 1 unreadable (BQ 104)
160. Documents marked as Jonas 3-Ring Binder Pages used by EPA with notation "American Cyanamid"
  161. EPA Interview of Norman Westerman, September 29, 1993
  162. MSDSs identified as part of attachments 1 and 2 (CYTC002605-2612)
  163. Pharmaceuticals and Effluent Plant, December 1981; (CYTC001146-1322)  
Boundbrook Plant, Process description and process flow charts of major OCD products, October 1980 (CYTC001323-1407)
  164. Massachusetts Institute of Technology Report Number D-74-107 Aniline Removal from DPA Ammonia Stream (CYTC001884-1934)
  165. Massachusetts Institute of Technology Report Number D-75-111 Aniline Removal from DPA Ammonia Stream - II (CYTC001935-1970)
  166. Untitled Boarhead Farm Site Bridgeton Township, PA (CYTC002154-2156)
  167. June 10, 1993 Memorandum from NA Weston to RB Tabakin with attachment (CYTC002146-2147)

**B. National Rolling Mills**

168. Boarhead Farms Agreement Group, undated, Initial Disclosures, for TI Group Automotive Systems, in the matter of B FAG v. AETC, Civil Action #02-CV-3830.
169. Capone, Louis A. 1993. Interview/Statement, conducted by R. Grabill of CDM. September 27, 1993.
170. Chesky, Frederick. 1994. Interview/Statement, conducted by R. Grabill of CDM. March 1, 1994.

171. Civitello, Michael I. 1993. Interview/Statement, conducted by R. Grabill of CDM. August 10, 1993.
172. Civitello, Michael J. 2004. Deposition in Boarhead Farms Agreement Group vs. Advanced Environmental Technology Corporation et al., Civil Action No. 02-CV-3830. December 8, 2004.
173. Freda, Peter G., 1993. Interview/Statement, conducted by R. Grabill of CDM. August 10, 1993.
174. Freda, Peter G., 2004. Deposition in Boarhead Farms Agreement Group vs. Advanced Environmental Technology Corporation et. al., Civil Action No. 02-CV-3830. December 8, 2004.
175. Civitello, Michael J., 1993. Interview/Statement, conducted by R. Grabill of CDM. August 10, 1993.
176. Jonas ledger page entitled "National Rolling Mills, Paoli PA", 1976, no Bates #, included with materials labeled from a file "Boarhead Farms Superfund Site, 011938.074694, Jones 3-Ring Binder Pages Used by EPA, Redwell #24".
177. Piotti, Fred Sr. 2005. Deposition in Boarhead Farms Agreement Group vs. Advanced Environmental Technology Corporation et. al., Civil Action No. 02-CV-3830. January 13, 2005.
178. Piotti, Lawrence R., 1994. Interview/Statement, conducted by R. Grabill of CDM. March 2, 1994.
179. Quici, Santo F. 1993. Interview/Statement, conducted by R. Grabill of CDM. August 10, 1993.
180. Quici, Santo F. 2004. Deposition in Boarhead Farms Agreement Group vs. Advanced Environmental.
181. Series of National Rolling Mills bills of lading, from 1975 (no Bates #s).
182. Winters, Merle, 1993. Interview/Statement, conducted by R. Grabill of CDM. September 16, 1993.
183. Winters, Merle, 2004. Deposition in Boarhead Farms Agreement Group vs. Advanced Environmental Technology Corporation et. al., Civil Action No. 02-CV-3830. December 3, 2004.

**C. Ford Motor Company**

184. Ford Motor Company, 1992. Response to USEPA's September 30, 1992 request for information. FORD000014-21.

185. USEPA, 1992. Information Request Letter to Ford Motor Company, re Boarhead Farms Site. September 30, 1992. With enclosures. FORD000001-13.
186. USEPA, 1994a. Memo to File, Subject Boarhead Farms - Philco Ford Waste. March 30, 1994. BSAI005378-80.
187. USEPA, 1994b. Information request letter to Ford Motor Company, re Boarhead Farms Site. April 12, 1994. With enclosures. FORD000022-135.
188. Ford Motor Company, 1994. Response to USEPA April 12, 1994 request for information. June 14, 1994. Attachments. BSAI000137-493.
189. USEPA, 1995. Information request letter to Ford Motor Company, re Boarhead Farms Site. November 28, 1995. FORD000495-516.
190. Ford Motor Company, 1996. Response to USEPA November 28, 1995 Information Request. January 31, 1996. FORD000518-524.
191. photo # 0029, Philco Ford Corp. reverse label dated August 6, 2003 (BSAI 062218 Reverse side)
192. Drawing of label, drum and drum fragments of HP Fuller Resiweld epoxy with Philco Ford stamp on the label (BSAI 062223)
193. Photographs of HP Fuller drums with Philco Ford stamp referenced at BSAI 062223)( BSAI 062229-062231 )
194. Tetra Tech Log referencing discovery of four labels from drum carcasses of the HP Fuller epoxy with Philco Ford stamp (BSAI 062255 Reverse side)
195. January 21, 1972, DeRewal proposal to dispose of Philco Ford Watsontown Plant "liquid waste solution" (BSAI 006257)
196. 3/27/72 - DeRewal invoice 395 (BSAI 006103)
197. 7/14/72 - DeRewal invoice 448 (BSAI 006155)
198. 8/17/72 - DeRewal invoice 469 (BSAI 006105)
199. 2/12/73 - Philco Ford Purchase Order 24298 (BSAI 006106)
200. Philco Ford Purchase Order 24441) (BSAI 006254)
201. 4/12/73 - Philco Ford Invoice No. 72343
202. 4/24/73 - Philco Ford Invoice No. 72405 (BSAI 006166)
203. 5/1/73 - Philco Ford Invoice No.72570 (BSAI 006264)

204. 10/31/73 - (DeRewal Invoice No. 746 (BSAI 006260))
205. Handwritten document identifies the drums by number and the pit in which they were found. (BSAI 006208-6209).
206. Weston Log Books: Log Book I (PHKS 049347-049450) (6/18/92-8/24/92); Log Book II (PHKS 049451-049553) (8/13/92-10/26/92) Log Book III (PHKS 049554-049709) (5/27/93-1/19/95).
207. Chem Met Services, Inc. Generator Waste Analysis form (BSAI 006114, 006192-6200).
208. Composite laboratory report (BSAI 006193-6197)
209. Composite laboratory report (BSAI 006202-6206, 6111-6212)
210. Chem Met Generator Waste Analysis form (BSAI 006201)
211. Uniform Hazardous Waste Manifest (BSAI 006100-6101)
212. BSAI 062218 (Reverse side)
213. Photo # 00031A
214. Tetra-Tech Report (BSAI 062222).
215. Excavated Drum Inventory (BSAI 08212).
216. Analysis (BSAI 059605-9609)
217. Waste Characterization Report (BSAI 059602).
218. BSAI 062229-062231 (Photographs of HP Fuller drums with Philco Ford stamp referenced at BSAI 062223)
219. BSAI 062255 (Reverse side) (Tetra Tech Log referencing discovery of four labels from drum carcasses of the HP Fuller epoxy with Philco Ford stamp)
220. BSAI 06221
221. BSAI 83716
222. Boarhead Farms OU-2 Group Excavated Drum Inventory (BSAI 082150-082156)
223. EPA memorandum to file dated 3/30/94 reporting a conversation with Ford's General Counsel. (BSAI 005378-5379)
224. Stock sale agreement. (BSAI 03003-030094)

- 225. Pictures taken by EPA of drums found at Boarhead Farm containing waste and paper cups with the writing "Philco Ford" on the cups. (Exhibit-10 at Barsum's deposition). (BSAI 034631)
- 226. Loral letter to EPA dated April 4, 1984(BSAI 035134).

**D. Standard Pressed Steel (SPS)**

- 227. Shea, Dennis, 2005. Oral Deposition in Boarhead Farms Agreement Group vs. Advanced Environmental Technology Corporation et. al., Civil Action No. 02-CV-3830. February 9, 2005.
- 228. SPS Technologies, 1988. Response to USEPA June 10, 1988 letter request. June 23, 1988. SPST00001-SPST00088.
- 229. SPS Technologies, 1992. Response to USEPA September 30, 1992 letter request. November 3, 1992. SPST00089-SPST00176.
- 230. SPS Technologies, 1996. Response to USEPA November 5, 1995 letter request. February 5, 1996. SPST00177 – SPST00396.
- 231. Stewart, David, 2000. Deposition in Luis Silva and Iolanda Silva v. Arco Petroleum Products et.al. January 6, 2000.
- 232. Stewart, David, 2005. Deposition in Boarhead Farms Agreement Group vs. Advanced Environmental Technology Corporation et. al., Civil Action No. 02-CV-3830. January 10, 2005. With Exhibits 1 through 14.
- 233. USEPA, 1992. Letter to Standard Pressed Steel Technologies, with attachments. September 30, 1992. BSAI035101 – BSAI035108.
- 234. USEPA, 1995. Letter to Standard Pressed Steel Technologies, with attachments. November 8, 1995. BSAI035084 - BSAI035094.

**E. Agere (Western Electric)**

- 235. Initial Disclosures, BOARHEAD FARM AGREEMENT GROUP plaintiff v. ADVANCED ENVIRONMENTAL TECHNOLOGY CORPORATON ET AL., Defendants, Civil Action 02-CV-3820, (AGER000001 through AGER000120). Undated.
- 236. AT&T, 1988. Correspondence to Ms. Suzanne Billings, USEPA, re Boarhead Farms Site. June 23, 1988. (AGER000001-000005)
- 237. AT&T Technology Systems, June 15, 1987. Internal Memo from C.L. Fraust, Re: Jonas Waste Removal, with attachments (BSAI31233-49)

- 238. Lucent Technologies July 25, 1997 correspondence to USEPA, includes May 14, 1973 Western Electric correspondence to Commonwealth of PADER. (BSAI0131216-312120)
- 239. Deposition of Marianne Santarelli, February 22, 2005, including the following exhibits:
- 240. Santarelli 2 - USEPA, March 19, 1997, Correspondence to Western Electric Company c/o Lucent Technologies. AGER000040-000059.
- 241. Santarelli 3 - Lucent Technologies, May 9, 1997, Correspondence to USEPA. AGER000060-000068.
- 242. Santarelli 4 - Western Electric, September 30, 1976, Space Report Allentown Works. BSAI070641-BSAI070661.
- 243. Santarelli 5 - Lucent Technologies, May 29, 1997, Correspondence to USEPA, AGER000069-0000118.
- 244. Santarelli 6 - AT&T, February 1, 1996 Correspondence to USEPA and USEPA, November 8, 1995, Correspondence to AT&T c/o Western Electric (Greensboro, NC), AGER000006-000039; and
- 245. Santarelli 7 - 1971 Western Electric/AT&T report on waste disposal for Allentown Works. (no Bates #s)
- 246. Documents Relating to Sylvan Chemical Corporation (BSAI1016598-16677)
- 247. Agere CERCLA 104(e) response to June 10, 1988 request (AGER000001-000005)
- 248. Agere CERCLA 104(e) response to November 8, 1995 request (AGER000006-000039)
- 249. Agere CERCLA 104(e) response to March 19, 1997 request (AGER000040-000120)

Boarhead Farms Settlement Agreement by and between Certain Plaintiff Settling Parties and Agere Systems Inc. (BSAI102980-102993)

### **III. Plaintiffs' Payment of Response Costs**

- 250. Plaintiffs' Amended and Supplemental Responses to Contention Interrogatories

#### **BFAG Agreements**

- 251. Sandy Purrington e-mail(PHKS 073639-073640)
- 252. "Agreement in Principle" (PHKS 071738- PHKS 071747).

253. Boarhead Farm Site PRP Group Organization Agreement (PHKS 071667-071680) also BSAI075568-75587
254. Environmental Remediation Trust Agreement for Operable Unit 1 PHKS 070841-070865. (PHKS 061072-061077).
255. signature pages for Cytech (PHKS 071624) which is attached to a Cytech letter dated January 15, 2002 (PHKS 071622), Agere (PHKS 071638-071639), Ford (PHKS 071640) and SPS (PHKS 071642-017643).
256. Agreement with Bigler Associates, Inc. ("Contractor") (PHKS 071575 - 071588) (PHKS 071589-071593).

Lucent (7/27/2000) (PHKS 071837)  
Cytech (again) (6/27/00) (PHKS 071837)  
SPS (4/12/00 and 7/7/00) (PHKS 071838-071839, 071847-01849)  
Ford (3/10/00 and 6/28/00) (PHKS 071843-071846)  
NRM Investment Co. (4/18/00) (PHKS 071850)

257. Draft OU-2 Group Organization Agreement (PHKS 074286-074299)
258. Letter from Agere dated May 31, 2001
259. Letter from John Judge dated June 13, 2001
260. Separation and Distribution Agreement by and between Lucent Technologies, Inc. and Agere Systems, Inc., dated 2/1/01

**U.S. EPA Removal Actions and Costs**

261. OU-1 Consent Decree
262. OU-2 Consent Decree
263. Revision to Notice of Lodging of Consent Decree Under CERCLA Published on January 8, 2002, U.S. Department of Justice, Wednesday, January 23, 2002,67 FR 3233)
264. November, 2000 updated cost report for BF Site. (BSAI 082007-082318)
265. EPA collection invoice 1/16/01 (PHKS 070912-070962)
266. EPA bill for collection 12/7/03 (PHKS 072550-72584)
267. Pitney Hardin Kip & Such letter dated 5/30/02 with report from Nihill and Rilley P.C. regarding EPA 12/5/01 invoice with invoices attached to BFAG group members (PHKS 070472-70480)
268. EPA bill for collection dated July 2, 2002 (PHKS 070497-070523)



- 269. EPA bill for collection dated January 27, 2003 (PHKS 072791-072815)
- 270. EPA collection invoice dated 5/13/02 (PHKS 072818-072821)
- 271. Boarhead Farm NPL Superfund Site Weekly Operations Report for week ending Saturday 3/6/93 to week ending September 3, 1992 (PHKS 001207-001289)
- 272. EPA summary of activities (June 16, 1992-July 17, 1992) (AR100027-028, AR100053-074, AR100089-102, AR100009-0014)
- 273. Memorandum dated July 12, 1989 from TAT Region III to MPowell OSC, EPA Region III (PHKS 001335-1345)
- 274. EPA memorandum dated 12/3/92 from Abraham Furtis to Deborah Y. Deitrich (AR400010-012 or 112?)
- 275. EPA February 26, 1992 memorandum from Edwin B. Erickson to Donald R. Clay (AR400001-009)
- 276. ATSDR record of activity dated 7/16/92 (AR305183-185)
- 277. EPA letter dated January 17, 1996 from Harry Harbold Project Manager, to David Ewald PADEP (AR308564)
- 278. EPA letter dated August 5, 2004 to Montgomery McCracken Walker & Rhodes with revised bill for collection (PHKS 061450-1455)
- 279. Memorandum from Edwin B. Erickson, Regional Administrator, USEPA Region 3, to Donald R. Clay, Assistant Administrator, USEPA, Office of Solid Waste and Emergency Response, September 4, 1992
- 280. USEPA Proposed Plan for the Site, 1/98
- 281. Letter from Glenn Harris to "Boarhead Defendants," 7/12/07 (BSAI082007 - BSAI0823)
- 282. USEPA cost report re services rendered by "Environmental Technology of North America" for "Period of Performance" 6/18/92 to 6/18/93, "Initiate Removal Action with appropriate personnel and equipment at Boarhead Farms Site" (BSAI 082200 - BSAI 082201)
- 283. Approval of 12 month statutory limit, 5/26/93 (PHKS002178-2220)
- 284. Approval of 2 month statutory (Erickson) (PHKS002235-2245)
- 285. Approval of Funding (PHKS002255-02263)
- 286. Approval of ceiling increase, 9/24/92 (PHKS002246-002254)

- 287. 9/3/92 Memo recovered cost figure (PHKS0024914-024915)
- 288. Final Work Plan and cost estimate, 8/5/91 (PHKS02509)
- 289. Request for Funding, 2/24/95 (PHKS041494-041731)
- 290. Filing Notice of Federal lien (BSAI000586-000612)
- 291. Administrative Order (BSAI005534-005554)
- 292. EPA Interim & Funding Cost Invoices (BSAI052940-053007)
- 293. 5/12/93 letter regarding completion (PHKS019522-019695)
- 294. Preliminary O&M Plan Groundwater Extraction & Treatment System 90% Design Submitted, prepared by Bigler Associates for PRP Group – Boarhead Farms Superfund Site, dated 12/01
- 295. Memorandum to Gerald Heston, OSC from Robert McGlade of Weston regarding Boarhead Farms NPL Site Trip Report, dated 11/18/94 (PHKS002179-02220)
- 296. Engineering Evaluation/Cost Analysis prepared by the USEPA, dated 6/95 (AR308369-308388)

**IV. Exhibits re: Settled Defendants**

**A. Bostik South**

- 297. 1975-1976 Chemical Leaman and Matlack shipping documents (BSAI00186-2321)
- 298. Bostik South documents (BSAI012996-BSAI013002)
- 299. Crown Metro, Inc., 2003. Information and Document Disclosure. March 20, 2003.
- 300. Emhart Industries, Inc. 2003. Information and Document Disclosure, with attachments EMHA0001-20. March 20, 2003.
- 301. Emhart Correspondences to USEPA, 1988. BSAI001860-5.

**B. Novartis**

- 302. Ciba-Geigy shipping records, 1976-1977 (BSAI026638-745, BSAI004078-253)
- 303. Ciba Geigy, Vendor Value Listings 1974-1975. BSAI004046-77.
- 304. Ciba-Geigy, 1988. Response letter to USEPA June 10, 1988 request for information. July 25, 1988. BSAI004015-20.

- 305. Ciba Specialty Chemicals Corporation, 1997. Response to USEPA March 19, 1997 letter. March 24, 1997. BSAI026746.
- 306. Novartis Corporation, 2003. Response to Case Management Order in Boarhead Farms Agreement Group v. AETC et. al. March 18, 2003. 3 pages.
- 307. USEPA, 1997. Request for information letter to Ciba Geigy Corporation, March 19, 1997. BSAI026749-769
- 308. Ciba-Geigy April 21, 1997 Response to the EPA
- 309. Ciba-Geigy March 8, 1999 Response to the EPA
- 310. Ciba-Geigy March 24, 1999 Response to the EPA

**C. Plymouth Tube**

- 311. Ellwood Ivins Tube Co., 1971. Department of the Army, Corps of Engineers, Application for Permit to Discharge or Work in Navigable Waters and Their Tributaries. June 10, 1971. BSAI032686-692.
- 312. Hawk, Hugh, 1977. Correspondence to PADER re: Hazardous Waste. May 24, 1977. BSAI005209.
- 313. Plymouth Tube Co., 1988. Correspondences to USEPA re Boarhead Farms Site. June 22, 1988, October 25, 1988. (BSAI000361, BSAI000358).
- 314. Copies of historical documents related to DeRwal Chemical Co. and Plymouth Tube Co. BSAI013067-079, BSAI052293-302, BSAI1020570, BSAI052294.

**D. Quickline**

- 315. DeRwal Chemical Company, 1973. Invoice to Quickline Design, Inc. BSAI032908.
- 316. DeRwal Chemical Company, 1973. Copy of correspondence to F. Marchewka of Quickline Design, Inc. March 2, 1973. BSAI016524.
- 317. McAndrew, Patrick F. 1996. Letter to L. Miller of USEPA, re Boarhead Farms Site. February 1, 1996.
- 318. Schmidt, Sanford F. 2003. Letter to Glenn Harris re Quickline Design & Mfg. May 16, 2003.

**E. Rohm & Haas**

- 319. Rohm and Haas Company, 2003. Initial Disclosure pursuant to February 3, 2003 Case Management Order
- 320. Rohm and Haas Black Acrylic Acid Monomer (BSAI 062253)
- 321. Drawing of label on Rohm and Haas drum (BSAI 062262)
- 322. Photographs of Rohm and Haas drum (BSAI 062280)
- 323. Photographs of packing Rohm and Haas drums (BSAI 062289)
- 324. Tetra Tech log indicating discovery of Rohm and Haas Glacial Acrylic Acid Monomer drum (BSAI 062255)
- 325. Drawing of label from Glacial Acrylic Acid Monomer drum (BSAI 062264)
- 326. 3 photographs of drum and label (BSAI 062289-062290)
- 327. Drum Photo # 0012
- 328. Code Documents (PHKS 065008-065011).
- 329. Chain of Custody Record for sample number BF2-WC-MA:22:DM:RHAA designated as BF-22 (BSAI 058448)
- 330. Echo test analysis (BSAI 058447)
- 331. Disposal documents (BSAI 059298, 059427-059431, 059299, 059432-059434).
- 332. Rohm and Haas' Glacial Acrylic Acid Monomer (photo nos. 0035, 0035A and 0035B)
- 333. Chain of Custody Record (BSAI 059478)
- 334. Echo test analysis (BSAI 058442-058445)
- 335. Disposal records (BSAI 059443-059445, 059272).

**F. Simon Wrecking**

- 336. Jonas ledger page entitled "Simon Wrecking Co. Williamsport", undated, no Bates #, included with materials labeled from a file "Boarhead Farms Superfund Site, 011938.074694, Jones 3-Ring Binder Pages Used by EPA, Redwell #24".
- 337. Morgan, Sharon Oras, 2003. Correspondence to Glenn Harris, re Boarhead Farms Group v. Simon Wrecking Co. Inc. et al. March 20, 2003.

338. Handwritten notes (possibly from DeRewal Chemical Co. files?), Bates #'d BH 000 3959 and BSA1016578.

**G. Unisys**

339. Drinker, Biddle, & Reath, 2003. Transmittal of Unisys Corporation's submissions to the document repository. March 20, 2003. BH 000 3962 through 3966, BH000 2554.1, BH 000 2554
340. Document Submission of Defendant Unisys Corporation pursuant to Case Management Order of February 3, 2003. UNIS-0001 through UNIS-0020.
341. Unisys, 1992. Correspondence to USEPA, Re: Boarhead Farms Site. November 12, 1992. PHKS027487-92.
342. Unisys, 1988. Correspondence to USEPA, Re: Boarhead Farms Site. July 19, 1988. BSAI001847-52.

**H. U.S. Navy**

343. Sansonetti, Thomas L., 2003. United States' Filing Pursuant to Paragraph 3.B(3) of the Case Management Order, BFAG v. AETC, Civil Action No. 02-3830. March 19, 2003.

**I. Rahns/Techalloy**

344. Section 104 (e) Response of Rahns Specialty Metals, Inc. (RAHN0001-RAHN0015)
345. Waste inspection report issued by Pennsylvania Department of Health Sanitary Engineering, dated 2/9/70 (RAHN 0012)
346. DeRewal Invoice to Techalloy dated 8/10/72 for removal of twenty drums of waste oil (Boarhead Exhibit P-37) (BSAI 032975)
347. Techalloy letter to Pennsylvania Department of Environmental Resources dated 10/12/72 (RAHN 0013)
348. DeRewal Chemical Company letter to Carpenter Technology Corporation dated November 27, 1972 (Boarhead Exhibit P-32) (BSAI025184)
349. DeRewal Chemical Company timecard for Bruce DeRewal dated 9/21/73
350. DeRewal Chemical Company timecard for "Walt" undated (RAHN 0016)
351. Techalloy Purchase Order no. R3453 dated 11/28/73 (RAHN 0014)

- 352. Answers to Plaintiff's Interrogatories Addressed to Techalloy, Inc. in Borough of Collegeville, et al. v. Superior Two Company, et al. , Montgomery County CCP, No. 81-7042 (RAHN0245-0268) (Marked as Exhibit Stufflet-1, 12/22/04)
- 353. August 1972 DCC invoice to Techalloy (P-37);
- 354. July 14, 1972 DCC quotation letter to Techalloy;
- 355. October 12, 1972 Techalloy letter to PADER (RAHN 0288);
- 356. 11/26/73 Techalloy purchase order to Liquid Removal Service;
- 357. DCC time card for Bruce DeRewal dated 9/21/73;
- 358. DCC time cards for "Walt" dated 11/26 and 11/27/73;
- 359. 5/16/73 PADER Waste Discharge Inspection Report of Techalloy (RAI-1N-521);
- 360. 10/17/73 PADER Regional Engineer's Review of Techalloy (RAHN-0592-93)
- 361. 6/5/72 Waste Inspection Report of Techalloy;
- 362. August 20, 1971 PADER Waste Discharge Inspection Report of Techalloy (RAHN-0622);
- 363. Techalloy 104(e) response to EPA;
- 364. February 1973 portions of Techalloy accounts payable register (Senin-2);
- 365. Sanitary Sewerage System, Drawing No. S-10 (Moran-1);
- 366. Application for Plumbing Permit to Connect Building to Public Sewer (Moran-2 and RAHN 1251-59);
- 367. Portions of Weston Technical Report (RAHN-0539- RAHN0555)
- 368. Deposition of Thomas Hess (12/22/04)
- 369. Deposition of Theodore Hahn (1/27/05)
- 370. Deposition of Peter Senin (2/24/05)
- 371. Deposition of Alfred Stufflet (12/22/04)
- 372. Deposition of Chet Czerpak (11/12/88)
- 373. Deposition of Theodore Hahn
- 374. Deposition of John T. Moran

**J. Thomas & Betts**

375. Invoices from DCC to Ansley for 1971 regarding pick up of waste chromic acid.

**K. Etched Circuits/Flexible Circuits**

376. All documents recovered from the Bucks County Department of Health files for Flexible Circuits, BSA1082378-082771

377. 11/6/87 letter from Stolisteimer to EPA

378. 10/2/87 letter from Bach to EPA

379. 9/11/87 letter from Bach to EPA

380. handwritten notes detailing DeRewal purchases and payments

381. 10/13/87 handwritten notes by Zia

382. 1/10/72 letter from DeRewal

383. 9/22/00 letter from Barbin to EPA

384. 1/27/86 letter and PPC Plan

385. 5/27/83 letter

386. undated Flexible Circuits Inc's promotional material

387. Flexible Circuits' 1969 Annual Report

388. multiple DeRewal invoice's and pickup. tickets 1973-75.

389. Deposition of Melvin Bach

390. Deposition of George Stolisteimer

391. Deposition of Ralph Parker

392. Deposition of Richard Yeatman

**V. Exhibits re: Non-Settled Defendants**

**A. Carpenter Technology Corporation**

393. 6/12/73 contract (Cheri-2) and legal department cover letter (Cheri-1);

394. 12/20/73 purchase order (Cheri-3);

- 395. "Waste Acid Removal Cost" chart (Cheri-8);
- 396. "DeRewal Chemical Co. Waste Acid Removal" chart (Cheri-7);
- 397. "DeRewal Chemical Co. 80#228" chart (Cheri-6);
- 398. 10/8/74 Memo (Mann-4);
- 399. 2/25/71 letter (Mann-15);
- 400. Analysis Requests (Mann-3);
- 401. Handwritten notes (Mann-12);
- 402. 7/17/69 Memo (Mann-8);
- 403. 7/8/69 Handwritten telephone note (Adams-2);
- 404. 2/25/70 Memo (Mann-14);
- 405. Polinko Affidavit;
- 406. Richard Cheri Deposition;
- 407. William Reger Deposition;
- 408. James Adams Deposition;
- 409. David Mann Deposition;
- 410. Robert Elbert Deposition;
- 411. 6/12/73 Agreement between DeRewal Chemical Co., Inc. and Carpenter Technology (Cheri-2) and legal department cover letter dated 6/5/73 forwarding proposed Agreement (Cheri- 1);
- 412. 12/20/73 purchase order (Cheri-3);
- 413. "Waste Acid Removal Cost" chart (Cheri-8);
- 414. "DeRewal Chemical Co. Waste Acid Removal" chart (Cheri-7);
- 415. "DeRewal Chemical Co. 80#228" ledger sheet (Cheri-6);
- 416. 10/8/74 Memo regarding waste acid disposal costs (Mann-4);
- 417. 2/25/71 letter from David Mann to Ernest Roth regarding CarTech waste acids (Mann-15);



- 418. Analysis Requests (Mann-3);
- 419. Handwritten notes (Mann-12);
- 420. 7/17/69 Memo regarding evaluation of Revere Chemical Corporation (Mann-8);
- 421. 7/8/69 Handwritten telephone note (Adams-2);
- 422. 2/25/70 Memo confirming Revere Chemical no longer removing CarTech's waste hydrochloric acid (Mann-14); and
- 423. Polinko Affidavit dated 10/12/06.

**B. NRM Investment**

- 424. 4/87 business confidential response to EPA;
- 425. February 1975 letter to NJDEP;
- 426. Handwritten document from 1977 detailing hauling NRM waste acid;
- 427. Accounts receivable ledger for 1974-75;
- 428. February 2000 letter to Plan, including attachments;
- 429. Handwritten notes from 1976;
- 430. Summaries of bills of lading and accounting;
- 431. May 1986 application for discharge permit;
- 432. May 1984 letter to Valley Forge Sewer Authority;
- 433. November 1989 evaluation of cyanide treatment alternatives with attachments;
- 434. April 1986 letter to EPA;
- 435. 1987 engineering records including handwritten calculations and sample results;
- 436. 1988-89 fact sheet and tables;
- 437. May 1989 proposed wastewater treatment plan;
- 438. 1986 handwritten notes re CN;
- 439. 6/88 handwritten notes;
- 440. Schematic of NRM facility;

- 441. Invoices, pick up tickets, summaries of the same;
- 442. Fred Piotti Deposition;
- 443. Santo Quici Deposition;
- 444. Frederick Chesky Deposition;
- 445. Peter Freda Deposition;
- 446. Merle Winters Deposition;

**C. AETC (Diaz)**

- 447. Letter Agreement, dated January 7, 1977, between R.W. Landmesser of Advanced Environmental Technology Corp. and Don Hollwedel of Diaz Chemical Corporation extending services (Landmesser-4);
- 448. Correspondence from H.D. Hollwedel of Diaz Chemical Corporation to Robert Landmesser of Advanced Environmental Technology Corp., dated April 14, 1977, confirming Diaz Chemical Corporation as primary source for disposal of its waste nitration acid (Landmesser-5);
- 449. Invoice, dated March 7, 1977, from Advanced Environmental Technology Corp. to Diaz Chemical Corporation (Landmesser-6);
- 450. USEPA's Information Request to Diaz Chemical Corporation (BSA102928 I - BSAI029290; B SA102929 1 -BSAI029293);
- 451. Diaz Chemical Corporation's Response to Information Request of USEPA (B SA1029 140-B SA1029277; BSA1029278-BSAJ029280);
- 452. Purchase Order dated 5/16/77 (BSA1029294-B5A1029295)
- 453. Acknowledgment of bill of lading dated 5/28/77 (Leuzarder-12);
- 454. Receipts (variously dated) (BSA1029297-BSAIO293 01)
- 455. Handwritten notes (BSA1029302)
- 456. Letter Agreement, dated January 7, 1977, between R.W. Landmesser of Advanced Environmental Technology Corp. and Don Hollwedel of Diaz Chemical Corporation extending services (Landmesser-4);
- 457. Correspondence from H.D. Hollwedel of Diaz Chemical Corporation to Robert Landmesser of Advanced Environmental Technology Corp., dated April 14, 1977, confirming Diaz Chemical Corporation as primary source for disposal of its waste nitration acid (Landmesser-5);

- 458. Invoice, dated March 7, 1977, from Advanced Environmental Technology Corp. to Diaz Chemical Corporation (Landmesser-6);
- 459. USEPA's Information Request to Diaz Chemical Corporation (BSA102928 I - BSAI029290; B SA102929 1 -BSAI029293);
- 460. Diaz Chemical Corporation's Response to Information Request of USEPA (B SA1029 140-B SA1029277; BSA1029278-BSAJ029280);
- 461. Purchase Order dated 5/16/77 (BSA1029294-B5A1029295)
- 462. Acknowledgment of bill of lading dated 5/28/77 (Leuzarder-l2);
- 463. Receipts (variously dated) (BSA1029297-BSAIO293 01)
- 464. Handwritten notes (BSA1029302)
- 465. Portion of document indicating the amount of money and waste streams that were sent to DCC from Ashland Chemical and Diaz (AETC197-199)
- 466. Deposition of Theodore Jenney
- 467. Deposition of Stanley Chiras
- 468. Deposition of Diane Shampine

**D. Handy & Harman**

- 469. 1/7/93 letter from Curran to EPA;
- 470. September 1992 Site Investigation;
- 471. 10/29/92 letter from Rosato to EPA;
- 472. February 1973 DCC invoice;
- 473. Handy & Harman interrogatory responses
- 474. Deposition of Mary Kolimar
- 475. Deposition of Thomas Curran

**VI. Ashland Documents**

- 476. Waste Disposal Ledger, August 1976 (ASHL00001)
- 477. Correspondence from J. Leuzarder to A. Curley, 8/3/76 (ASHL00002-ASHL00003)
- 478. Correspondence from R.T. Olsen to A. Barnhouse, 8/4/76 (ASHL00004)
- 479. Bills of Lading, 8/9/76-8/20/76 (ASHL00005-ASHL00010)
- 480. Correspondence from S. Lemore to M. DeRewal, 8/23/76 (with attached invoices/sales orders) (ASHL00011-ASHL00032)
- 481. Correspondence from S. Lemore to M. DeRewal, 8/23/76 (ASHL00033)
- 482. Memo Re: Waste Chemical Disposal, 8/23/76 ASHL00034-ASHL00036)
- 483. Bills of Lading, 8/23/76-8/31/76 ASHL00037-ASHL00044)
- 484. Waste Disposal Ledger, September 1976 ASHL00045-ASHL00047)
- 485. Bills of Lading, 9/1/76-9/16/76 ASHL00048-ASHL00065)
- 486. Memo Re: Waste Chemical Disposal, 9/16/76 ASHL00066-ASHL00069)
- 487. Bills of Lading, 9/17/76-9/18/76 ASHL00070-ASHL00072)
- 488. Memo Re: Visit with Current Spent Acid Disposer, 9/20/76 ASHL00073-ASHL00074)
- 489. Bills of Lading, 9/21/76-9/2\_/76 ASHL00075-ASHL00084)
- 490. Waste Disposal Ledger, October 1976 ASHL00085-ASHL00086)
- 491. Bills of Lading, 10/1/76-10/13/76 ASHL00087-ASHL00099)
- 492. Memo Re: Monthly Report - September 1976, 10/13/76 ASHL00100-ASHL00104)
- 493. Bills of Lading, 10/14/76-10/19/76 ASHL00105-ASHL00110)
- 494. Memo Re: Visit to Disposal Site, 10/19/76 ASHL00111-ASHL00112)
- 495. Bills of Lading, 10/20/76-10/29/76 (ASHL00113-ASHL00121)
- 496. Waste Disposal Ledger, November 1976 (ASHL00122)
- 497. Bills of Lading, 11/4/76-12/16/76 (ASHL00123-ASHL00139)

- 498. Waste Disposal Ledger, January 1977 (ASHL00140)
- 499. Waste Disposal Ledger, February 1977 (ASHL00141)
- 500. Bills of Lading, 1/29/77-2/10/77 (ASHL00142-ASHL00157)
- 501. Memo Re: Monthly Report - January 1977, 2/11/77 (ASHL00158-ASHL00162)
- 502. Bills of Lading, 2/11/77-2/\_\_\_/77 (ASHL00163-ASHL00188)
- 503. Waste Disposal Ledger, March 1977 (ASHL00189-ASHL00191)
- 504. Bills of Lading, 3/1/77-3/2/77 (ASHL00192-ASHL00195)
- 505. Laboratory Analysis, 3/2/77 (ASHL00196)
- 506. Bills of Lading, 3/3/77-3/18/77 (ASHL00197-ASHL00212)
- 507. DeRewal Invoice, 3/19/77 (ASHL00213-ASHL00214)
- 508. Bill of Lading, 3/1\_/77 (ASHL00215)
- 509. DeRewal Invoice, 3/19/77 (ASHL00216)
- 510. Bills of Lading, 3/19/77-3/31/03 (ASHL00217-ASHL00234)
- 511. Waste Disposal Ledger, March and April 1977 (ASHL00235-ASHL00237)
- 512. Bills of Lading, 4/2/77 (ASHL00238-ASHL00239)
- 513. Memo Re: Monthly Report - March 1977, 4/5/77 (ASHL00240-ASHL00245)
- 514. Bills of Lading, 4/5/77 (ASHL00246-ASHL00248)
- 515. DeRewal Invoice, 4/9/77 (ASHL00249-ASHL00250)
- 516. Bills of Lading, 4/12/77 (ASHL00251-ASHL00252)
- 517. Memo Re CDN Spent Acid Disposal, 4/14/77 (ASHL00253-ASHL00254)
- 518. Bill of Lading, 4/15/77 (ASHL00255)
- 519. Memo Re: Visit to Modern Transportation, 4/19/77 (ASHL00256)
- 520. Correspondence dated September 7, 1976 from Leuzarder to DeRewal (Leuzarder-1 1);
- 521. Correspondence from Susan Lomore to Manfred DeRewal, dated August 23, 1976, confirming conversation regarding required certificate of insurance to be

issued to Advanced Environmental Technology Corp. for work to be performed at Ashland Chemical (Leuzarder-13);

- 522. Handwritten notes (undated) referring to sulfuric acid leak at Boarhead Farms (Landmesser-3);
- 523. USEPA's Information Requests to Advanced Environmental Technology Corp. and Advanced Environmental Technology Corporation's Response to Information Requests of USEPA (BSA1022885-022936 and BSA1022975022997)
- 524. Summary of Bills of Lading and monthly waste totals (demonstrative exhibit)
- 525. July 10, 1989 Letter from Robert J. Shusterman to Jack Kelly (EPA) (CYTC000432-434)
- 526. Photo 0008 – Ashland Chemical Label – June 18, 2003
- 527. Photo Log
- 528. Photo0008A, 6/18/03 (subsequently received)
- 529. Tetra Tech drawing of the label
- 530. Laboratory results, 9/26/03
- 531. Mark Mecalf e-mail, 10/13/03
- 532. Photo 0044 - Ashland Chemical Label and Contents - September 2, 2003
- 533. Drum testing results
- 534. Tetra Tech Summary
- 535. Tetra Tech Log for 6/18
- 536. Four photographs taken by Tetra Tech
- 537. Tetra Tech Log
- 538. Photo 16 of disc 16
- 539. 8/12 drawing made of label
- 540. Chain of Custody Record
- 541. Generator Approval Notification and Waste Characterization Report
- 542. Code Progress meeting Minutes, 8/21/03

- 543. Analytical Test Report dated Dec. 9, 2003 (G. Schoening)
- 544. Analytical Test Report dated Dec. 9, 2003 (E. Marti)
- 545. Solid waste Identification Interim Report dated Nov. 16, 2003 (D. DeGarmo)
- 546. Guilty Plea and Colloquy (6/19/78)(U.S.E.D. Pa.)

/s/ Jeffrey L. Pettit

JEFFREY L. PETTIT

Attorney I.D. No. 21624

RICHARD C. BIEDRZYCKI

Attorney I.D. No. 30604

Phelan, Pettit & Biedrzycki, LLC

1600 North American Building

121 South Broad Street

Philadelphia, PA 19107

(215) 546-0500

Counsel for Defendant Ashland Inc.

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